

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: FAIRLIFE MILK PRODUCTS
MARKETING AND SALES PRACTICES
LITIGATION**

**This Document Relates to All Cases
MDL No. 2909
Master Case No. 19-cv-3924
Judge Robert M. Dow, Jr.**

I, Richard M. Paul III, declare as follows:

1. I am the managing partner of the law firm PAUL LLP, counsel of record in this case. I make this declaration in support of Motion for Appointment of Leadership Structure filed by Saeed & Little, LLP on behalf of plaintiffs in *Sabeehullah et.al. v. Fairlife, LLC et.al.* The affirmations included in this declaration are based upon my personal knowledge and if called to testify to the contents hereof, I could and would competently do so.

2. Paul LLP has seven attorneys, all of whom concentrate on complex commercial and consumer contingent-fee litigation, devoting a substantial portion of their practice to prosecuting class and mass actions. Paul LLP is capable of handling large scale and high stakes litigation on a fully contingent basis and is in a position to advance substantial litigation costs and to prosecute complex and lengthy litigation that includes many hundreds of clients.

3. I, and the attorneys in my firm, have substantial experience prosecuting complex class (and other) actions on behalf of consumers against manufacturers and large corporations. I have been appointed by courts across the country to the role of class counsel on dozens of occasions, and prior to that, was a partner in a large defense firm representing large companies defending dozens of class actions.

1 4. Equally as important to me, I have the ability, experience, and willingness to try my client's
2 cases, whether to a jury, a judge, or an arbitrator. I have tried numerous cases in all three settings on
3 behalf of plaintiff classes, as well as individual or corporate plaintiffs and defendants.

4 5. On three occasions, court-appointed MDL leadership has asked me to try a bellwether case in an
5 MDL. Most recently, in 2017, I was asked by appointed class counsel to be co-lead trial counsel on
6 behalf of a class of approximately 22,000 corn farmers in the State of Minnesota. The trial was a
7 bellwether for a series of individual state class actions forming part of a parallel state and federal multi-
8 district litigation. During the third week of trial, a nationwide class settlement for all litigation in both
9 the state and federal MDL was reached in the amount of \$1.51 billion.

10 6. I and the members of my firm, together with my co-counsel, have invested significant time and
11 resources developing and pleading the legal claims, researching the allegation put forth in *Sabeehullah*
12 *et.al. v. Fairlife, LLC et.al.*

13 7. In addition, I and the members of my firm, together with my co-counsel, extensively researched
14 the legal basis for the claims asserted and worked together to develop liability and damages theories
15 that were pled in this matter.

16 8. If Syed Ali Saeed from Saeed & Little, LLP is appointed as co-lead in this MDL, I and my firm
17 remain committed to continuing to assist my co-counsel with devotion and commitment.

18 I declare under penalty of perjury that the foregoing is true and correct.

19
20 Dated this 6th day of December 2019.

21
22 /s/ Richard M. Paul III
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